

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE :

JOSE DANIEL MORALES RIVERA

Debtor(s)

CASE NO. 16-03661 BKT

CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

**TO THE HONORABLE COURT:**

COMES NOW, creditor Empresas Berríos INC. represented by the undersigned attorney, and very respectfully ALLEGES, STATES and PRAYS:

1. On May 6, 2016, Debtor filed a proposed Chapter 13 Payment Plan.
2. Empresas Berríos Financiera is a secured creditor in the present case. (*See Proof of Claim #2-1*)
3. That Debtor's Payment Plan does not include any type of treatment for the appearing creditor.
4. Empresas Berríos Financiera objects to the confirmation of such Plan because the Debtor failed to provide treatment for the appearing creditor's claim.
5. 11 USC §1325 (5)(A) states that the court shall confirm a plan with respect to each allowed secured claim if the holder of such claim has accepted the plan.

WHEREFORE, it is respectfully requested from this Honorable Court to deny the confirmation of Debtor's Payment Plan.

**I HEREBY CERTIFY:** that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Debtor's Attorney Roberto Figueroa Carrasquillo Esq., Chapter 13 Trustee Alejandro Oliveras Rivera Esq. US Trustee Monsita Lecaroz Arribas, Esq. and to all those who in this case have registered for receipt of notice by electronic mail.

**RESPECTFULLY SUBMITTED:**

In Caguas, Puerto Rico, this 1 day of June, 2016.

/s/Jessenia Ramos Talavera, Esq.  
USDC 223607

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